

MCCOLLISTER CONTAINER SERVICE COMPANY
2200B SOUTH AVENUE
COUNCIL BLUFFS, IOWA 51501
EPA ID Number: IAD991286014

ON

JUNE 1, 1994

BY

U.S. Environmental Protective Agency
Region VII
Waste Management Division

INTRODUCTION

At the request of the Brian Mitchell of the Iowa Section, a RCRA complaint inspection was conducted at McCollister Container Service Company, Council Bluffs, Iowa, on June 1, 1994. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

McCollister Container Service Company (McCollister):
John S. McCollister, Owner
Larry Williams, Technical Services

U.S. Environmental Protection Agency (EPA)
Robert C. Anslyn, Engineer\Scientist (AARP\SEE)

INSPECTION PROCEDURES

The purpose of conducting this Complaint Inspection was to:

- (1) Check hazardous waste management, waste streams, quantity, treatment, storage and disposal.
- (2) Check used oil management.
- (3) Obtain copies of manifests from January 1992 to present.

Upon arrival at the facility I contacted Mr. McCollister and Mr. Williams, who acted as the official facility representative during the course of the inspection. I presented Mr. McCollister and Mr. Williams with my EPA Identification. I then explained the purpose of the inspection and the procedures I would follow. I provided Mr. Williams with the RCRA Inspection Confidentiality Notice which he signed as acknowledgement of receipt (attachment #1). I also provided Mr. Williams with a copy of the U.S. Federal Code 1001, which he read, concerning false statements to federal inspectors. During this inspection, I discussed and reviewed the facility's operations, wastes generated and waste management practices. During the visual inspection I was accompanied by Mr. Williams. At the conclusion of the inspection I summarized and reviewed my findings with Mr. McCollister and Mr. Williams. I provided Mr. Williams with the Request for Confidential Treatment form. which he signed as acknowledgement of receipt (attachment #2). I further provided Mr. McCollister



R00053702

RCRA Records Center

with a copy of the Receipt for Documents and Samples.. (attachment #3).

FACILITY DESCRIPTION AND OPERATIONS

McCollister is a full-service reconditioner of used petroleum lubricant steel drums. McCollister occupies approximately 65,000 square feet in an industrial area of Council Bluffs, Iowa. Employees work one 8-hour shift per day, five days a week. McCollister reconditioning process includes washing, straightening and painting drums. Based on the information received during the course of this inspection it appeared that the only waste that McCollister generates is a oil\diesel fuel mixture.

FINDINGS AND OBSERVATIONS

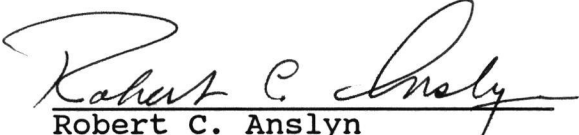
The used petroleum lubricant steel drums arrive at the plant on trucks. The drums begin the process by having the interior of the drums flushed with a diesel fuel. After draining these drums, the waste oil\diesel fuel mixture is stored. Approximately 2000 gallons of oil\diesel waste is generated monthly. This waste is sold in bulk to Searle Petroleum Co, Council Bluffs, Iowa for energy recovery. No hazardous waste determination had been conducted on this oil\diesel mixture.

After the oil\diesel waste has been drained from the drums, the process continues by washing the drums in a Tide wash tunnel. After washing, the drums are buffed on the outside. The interior is then washed with hot water. This wastewater is put through a oil\water separator (Photo #1). The oil from the separator is mixed with the oil\diesel waste. The water is recycled and the caustic wash water is recharged and recycled in a closed system (Photo #2). The wastewater is discharged to the sewer system. The discharge is monitored by the City of Council Bluffs. This process does not produce a sludge.

The drums are then dried and painted with a lead free paint (MSDS attachment #5)(Photo #3). The paint guns are cleaned daily with a solvent. After cleaning, this used solvent is put into the paint to be used as a thinner.

These restored drums are then stored at the facility until use is required. Some drums are reconditioned for other facilities, however, the primarily function of McCollister Container Service Company is to recondition drums for use by McCollister & Company. McCollister & Company, located at 2200A South Ave, Council Bluffs, Iowa, is the parent company of McCollister Container and Service Company. When questioned, Mr. Williams stated that McCollister & Company conducts business as an oil distributor. This distribution business is operated next to the container company facility. Mr. Williams stated further

that no hazardous wastes are generated by McCollister & Company.


Robert C. Anslyn
Engineer\Scientist\AARP\SEE
Date:

Attachments:

1. Confidentiality Notice (2 pages)
2. Request For Confidential Treatment (1 page)
3. Receipts for Documents and Samples (1 page)
4. Photographs (2 pages)
5. MSDS (2 pages)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>McCollister Container Service</i>	
Facility Address <i>2200B South Ave, Council Bluffs, IA. 51503</i>	
Inspector (print) <i>ROBERT ANSKYN</i>	Title <i>Engineer/Scientist</i>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	
Date <i>6-2-94</i>	

It is possible that the United States Environmental Protection Agency (EPA) will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. EPA is required to make inspection data available in response to FOIA requests, unless the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information.

To claim information confidential, you must certify that each claimed item meets all of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

In addition, within fifteen (15) calendar days of the claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). This statement should be mailed by registered, return-receipt requested mail to the Inspector at the address listed above. Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

At the completion of the inspection, you will be given a receipt for all materials collected. At that time you may make claims that some or all of the information is confidential and meets the criteria listed above.

U.S.EPA INSPECTION CONFIDENTIALITY NOTICE (cont.)

Facility Name	MS Collision Container Service
Facility Address	2200 B South Ave. Council Bluffs, IA. 51503

If you are not authorized by your company and there is no one on the premises of the facility who is authorized to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the authorized representative designated below.

Authorized Representative _____

Title _____

Address _____

If the authorized representative listed above requests confidential treatment, they must return a statement specifying any information which should receive confidential treatment and written comments in support of the claim based on factors listed in 40 CFR 2.204(e)(4).

This statement from the authorized representative should be mailed by registered, return-receipt requested mail within fifteen (15) calendar days of receipt of the Confidentiality Notice to the Inspector at the address listed on page 1.

Failure to submit confidentiality claims and comments within the fifteen (15) day period will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

=====

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Facility Representative Provided Notice (print)	Title
LARRY WILLIAMS	Tech Services
Signature/Date	
Larry Williams	6/1/94

(rev:1/20/93)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REQUEST FOR CONFIDENTIAL TREATMENT

Facility Name <i>McCormick Container Service</i>
Facility Address <i>22008 South Ave, Council Bluffs, IA, 51503</i>

Information for which confidential treatment is requested:

Not at this time

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. The undersigned further acknowledges that they are authorized to make such claims for their firm.

The undersigned also certifies that each claimed item described above meets all of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

In addition, within 15 days of your claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

Authorized Representative (print) <i>Larry Williams</i>	Signature/Date <i>Larry Williams 6/1/94</i>
No confidential treatment claimed during the inspection: _____ (Facility Representative's initials)	
Inspector (print) <i>Robert Anshyn</i>	Signature/Date <i>Robert Anshyn 6-2-94</i>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <i>McCallister Container Service</i>
Facility Address <i>2200 B South Ave, Council Bluffs, IA. 51503</i>

Documents Collected? YES___ (list below) NO___

Samples Collected? YES___ (list below) NO___ Split Samples: YES___ NO___

Documents/Samples were: 1)Received no charge___ 2)Borrowed___ 3)Purchased___

Amount Paid: \$___ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

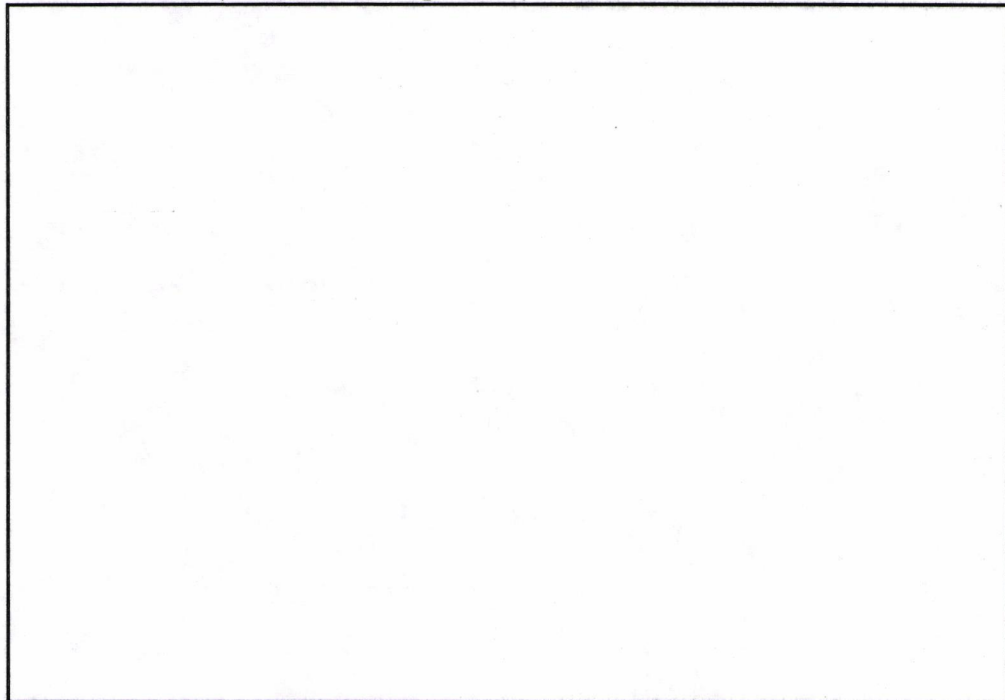
Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1 Photo of WWTs
1 Photo of Paint Room
1 Photo of Oil Water Separator
1 MSDS

Facility Representative (print) <i>John McCullister</i>	Signature/Date <i>[Signature]</i>
Inspector (print) <i>Robert C. Anshyn</i>	Signature/Date <i>[Signature]</i>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	



McCollister Container Service Company #3
Paint Room (lead free paint)





McCollister Container Service Company #1
A oil\water seperator.



McCollister Container Service Company #2
Closed Wastewater Treatment System

M A T E R I A L S A F E T Y D A T A S H E E T

+ Blue

***** I IDENTIFICATION *****

MANUFACTURED BY: Diamond-Vogel Paint Co.
Bluff road & Oak Streets
Burlington, Iowa 52601

REVISED: 18-APR-88

EMERGENCY TELEPHONE # : 319-754-8408
712-737-4993

INFORMATION TELEPHONE # : 319-754-8408
712-737-4993

MFG. PRODUCT NUMBER: 1B-7629
FORMERLY: WLX-124-A

PROPER SHIPPING NAME: PAINT

TRADE NAME: FAST BLUE ENAMEL

***** II HAZARDOUS INGREDIENTS *****

MSG	INGREDIENT	CAS #	WT. %	ACGIH			OSHA		VAPOR PRESSURE
				TLV	STEL	PEL	CEILING	PEAK	
(1)	V.M & P	64742-89-8	60	300 PPM	400 PPM	350 PPM	1800 PPM		1.1 30.0 mm
(1)	Mineral Spirits	64741-41-9	< .5	100 PPM		500 PPM			.7 2.0 mm
(1)	Xylene	1330-20-7	< .5	100 PPM	150 PPM	100 PPM	200 PPM		1.0 9.5 mm

WARNING MESSAGES:

- (1) Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents may be harmful or fatal. Chronic exposure may cause damage to the central nervous system, respiratory system, lung, eye, skin, liver, gastrointestinal tract, spleen, kidneys, and blood.

***** III PHYSICAL DATA *****

BOILING RANGE: 244-380 degrees F. EVAPORATION RATE: *slower than ether*

PERCENT VOLATILE BY VOLUME: 73.00% WEIGHT PER GALLON: 7.34 LBS

VAPOR DENSITY: * heavier than air *

***** IV FIRE AND EXPLOSION HAZARD DATA *****

FLASH POINT: 2 degrees C. 36 degrees F. LEL: Refer to Section II

FLAMMABILITY CLASSIFICATION: CLASS 1B

DOT CLASSIFICATION (HAZARD CLASS): *flammable liquid*

EXTINGUISHING MEDIA: *carbon dioxide, dry chemical, or fire foam*

UNUSUAL FIRE AND EXPLOSION HAZARDS: keep away from heat, sparks, and flame.

SPECIAL FIRE FIGHTING PROCEDURES: Water is unsuitable, but may be used to cool closed containers.

***** V HEALTH HAZARD DATA *****

THRESHOLD LIMIT VALUE: See Section II.

EFFECTS OF OVEREXPOSURE:

ACUTE: Inhalation of vapors could cause respiratory irritation.
Liquid could irritate or damage eyes.

CHRONIC: None recognized.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: consult physician

PRIMARY ROUTE(S) OF ENTRY: skin and inhalation

EMERGENCY AND FIRST AID PROCEDURES:

INHALATION: Remove to fresh air. Restore breathing. Treat symptomatically.
Consult a physician.

EYES: Flush immediately with large amounts of water for at least 15 minutes. Take to a physician for medical treatment.

SKIN: Wipe off with towel. Remove remainder with mineral spirits, turpentine, or lacquer thinner. Wash with soap and water.
Remove contaminated clothing.

-----***** VI REACTIVITY DATA *****-----
STABILITY: *stable* HAZARDOUS POLYMERIZATION: *will not occur*

INCOMPATABILITY: * unknown *

HAZARDOUS DECOMPOSITION PRODUCTS: Fire, burning and welding may generate carbon monoxide.

CONDITIONS TO AVOID: Fire, burning, and welding

-----***** VII SPILL OR LEAK PROCEDURES *****-----

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Remove all sources of ignition (flames, hot surfaces and electrical, static or frictional sparks). Avoid breathing vapors. Ventilate area. Use non-sparking tools. Remove with inert absorbant.

WASTE DISPOSAL METHOD: Dispose of in accordance with local, state, and federal regulations.

-----***** VIII SPECIAL PROTECTION INFORMATION *****-----

RESPIRATORY PROTECTION: In confined areas of poor ventilation, use chemical cartridge respirator or self-contained breathing apparatus.

VENTILATION: Provide general dilution or local exhaust ventilation in volume and pattern to keep TLV and LEL of most hazardous ingredient in Section II, below acceptable limit.

PROTECTIVE GLOVES: None required except for prolonged contact.

EYE PROTECTION: Safety glasses or goggles if there is a danger of splashing or if product is applied by spraying.

OTHER PROTECTIVE EQUIPMENT: * none *

HYGIENIC PRACTICES: See section V

-----***** IX SPECIAL PRECAUTIONS *****-----

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Do not store near heat, sparks, or flame.

OTHER PRECAUTIONS: * none *